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11 Attorneys for Specially-Appearing Defendant OLD REPUBLIC
12 TITLE INSURANCE GROUP, INC. and Defendants
13 OLD REPUBLIC NATIONAL TITLE INSURANCE
14 COMPANY and OLD REPUBLIC TITLE COMPANY OF
15 NEVADA

16
17 **UNITED STATES DISTRICT COURT**
18 **DISTRICT OF NEVADA**
19

20 HSBC BANK USA, NATIONAL
21 ASSOCIATION, AS TRUSTEE, IN TRUST
22 FOR THE REGISTERED HOLDERS OF
23 ACE SECURITIES CORP., HOME EQUITY
24 LOAN TRUST, SERIES 2006-FM2, ASSET
25 BACKED PASS-THROUGH
26 CERTIFICATES,

27 Plaintiff,

28 vs.

29 OLD REPUBLIC TITLE INSURANCE
30 GROUP, INC., OLD REPUBLIC
31 NATIONAL TITLE INSURANCE
32 COMPANY; OLD REPUBLIC TITLE
33 COMPANY OF NEVADA; DOE
34 INDIVIDUALS I through X; and ROE
35 CORPORATIONS XI through XX, inclusive,

36 Defendants.
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Case No.: 2:20-cv-01975-RFB-DJA

**STIPULATION AND PROPOSED
ORDER EXTENDING OLD REPUBLIC
NATIONAL TITLE INSURANCE
COMPANY'S AND OLD REPUBLIC
TITLE INSURANCE GROUP, INC.'S
TIME TO RESPOND TO COMPLAINT**

(First Request)

1 Defendants Old Republic National Title Insurance Company (“Old Republic”) and Old
2 Republic Title Company of Nevada (“Old Republic Agency”) and Specially-Appearing
3 Defendant Old Republic Title Insurance Group, Inc. (“ORTIG”) and plaintiff HSBC Bank USA,
4 National Association, as Trustee, in Trust for the Registered Holders of ACE Securities Corp.,
5 Home Equity Loan Trust, Series 2006-FM2, Asset Backed Pass-Through Certificates (“HSBC”)
6 (collectively, the “Parties”), by and through their counsel of record, hereby stipulate as follows:

7 **WHEREAS**, HSBC commenced the action by filing a Complaint on October 23, 2020, in
8 the Eighth Judicial District Court for the State of Nevada, Clark County (Case No. A-20-823631-
9 C);

10 **WHEREAS**, on October 25, 2020, Old Republic filed a Petition of Removal with this
11 Court, based upon diversity jurisdiction (ECF No. 1);

12 **WHEREAS**, on November 3, 2020, HSBC served Old Republic and ORTIG with the
13 complaint pursuant to the executed summons filed on November 6, 2020 (ECF Nos. 6-7);

14 **WHEREAS**, HSBC has not yet served the summons and complaint on Old Republic
15 Agency;

16 **WHEREAS**, Old Republic’s and ORTIG’s responses to the Complaint are due on
17 November 24, 2020;

18 **WHEREAS**, Old Republic and ORTIG are requesting an extension of time to respond to
19 the Complaint to afford their counsel additional time to review, analyze and respond to HSBC’s
20 Complaint;

21 **WHEREAS**, HSBC has agreed to extend Old Republic’s and ORTIG’s time to respond to
22 the Complaint by thirty (30) days to December 24, 2020; and

23 **WHEREAS**, this is the first stipulation for an extension of Old Republic’s and ORTIG’s
24 time to respond to the complaint.

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Now, therefore, the Parties hereto, by and through their counsel of record, hereby stipulate and agree as follows:

1. Old Republic and ORTIG shall respond to the complaint on or before December 24, 2020.

2. Old Republic and ORTIG intend to preserve their rights and do not expressly waive any and all defenses listed in Fed. R. Civ. P. 12(b).

DATED this 19th day of November, 2020

DATED this 19th day of November, 2020

WRIGHT FINLAY & ZAK, LLP

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

/s/-Lindsay D. Robbins

/s/-Sophia S. Lau

By: _____

By: _____

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HSBC BANK USA, NATIONAL
ASSOCIATION, AS TRUSTEE, IN
TRUST FOR THE REGISTERED
HOLDERS OF ACE SECURITIES
CORP., HOME EQUITY LOAN
TRUST, SERIES 2006-FM2, ASSET
BACKED PASS-THROUGH
CERTIFICATES

Attorneys for Specially-Appearing Defendant
OLD REPUBLIC TITLE INSURANCE
GROUP, INC. and Defendants
OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY and OLD
REPUBLIC TITLE COMPANY OF
NEVADA

ORDER

IT IS SO ORDERED:

Dated: November 20, 2020 _____

By:  _____
UNITED STATES MAGISTRATE JUDGE



CERTIFICATE OF SERVICE

I hereby certify that on November 19, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

